

Exhibit 3

November 17, 2020

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- STUART VARDAMAN -

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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ULKU ROWE,

Plaintiff,

Case No.
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X

DATE: November 17, 2020

TIME: 9:37 a.m.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION
OF STUART VARDAMAN, held via Zoom, pursuant to ^
Notice, before Hope Menaker, a Shorthand Reporter
and Notary Public of the State of New York.

1 - STUART VARDAMAN -

2 for the role in Kirsten's organization?

3 A. I -- I don't know.

4 Q. Did you make any notes in GHire with
5 respect to that?

6 A. I -- I don't know. That would have
7 hinged -- I -- I don't know.

8 Q. Did you make any notes in Thrive with
9 respect to that?

10 A. Not that I recall.

11 Q. Do you create updates for Kirsten
12 similar to the -- to the updates you made for Mr.
13 Shaukat?

14 A. Each executive has a different way
15 they like to go about things. As I recall in
16 supporting Kirsten it was much more ad hoc, kind
17 of a key indicator at the pace at which we're
18 having market activity as a recruiting team and
19 then like at the drop of a hat being expected to
20 jump on a -- on a call with a senior executive
21 like Kirsten to provide a little bit of a -- of a
22 status update, but it's much more ad hoc I would
23 say.

24 Q. Do you recall anything in writing
25 regarding Ms. Rowe that you communicated to

1 - STUART VARDAMAN -

2 Kirsten?

3 A. I don't recall.

4 Q. Other than the head of financial
5 services role with Mr. Shaukat's organization and
6 the head of financial services role in Kirsten's
7 organization, are you aware of any other Level 9
8 or Level 10 roles that is -- that are in process
9 with respect to financial services or relating to
10 financial services?

11 A. No, I'm not. No.

12 MS. GREENE: All right, give me just
13 one second.

14 Okay. I have no further questions.

15 Mr. Gage, do you have any questions?

16 MR. GAGE: I have no questions and
17 the witness will read and sign.

18 MS. GREENE: Okay. That's it for us
19 today, Mr. Vardaman. Let the court reporter
20 take us -- the videographer take us off the
21 record and then we'll be able to leave.

22 THE WITNESS: Okay.

23 THE VIDEOGRAPHER: This completes the
24 video deposition of the Stuart Vardaman
25 conducted virtually on November 17, 2020 at